## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KYKO GLOBAL, INC., a Canadian corporation, KYKO GLOBAL GmbH, a Bahamian corporation, PRITHVI SOLUTIONS, INC., a Delaware Corporation

Case No. 2:18-cv-1290-WSS

Plaintiffs,

v.

PRITHVI INFORMATION SOLUTIONS. LTD, an Indian corporation, VALUE TEAM CORPORATION, a British Virgin Islands corporation, SSG CAPITAL PARTNERS I, L.P., a Cayman Islands Limited Partnership, SSG CAPITAL MANAGEMENT (HONG KONG) LIMITED, a private Hong Kong company, MADHAVI VUPPALAPATI, an individual, ANANDHAN JAYARAMAN, an Individual, SHYAM MAHESHWARI, an individual, IRA SYAVITRI NOOR A/K/A IRA NOOR VOURLOUMIS, an individual, DINESH GOEL, an individual, WONG CHING HIM a/k/a Edwin Wong, an individual, ANDREAS VOURLOUMIS, an individual, PRITHVI ASIA SOLUTIONS LIMITED, a Hong Kong company

Defendants.

## **ORDER**

AND NOW, on this \_\_\_\_\_ day of \_\_\_\_\_, 2020, after considering Plaintiffs' Motion to Obtain Extension of Time to Serve Responses and Objections to the SSG Defendants' First Set of Interrogatories and Request for Production of Documents and to Obtain Protective Order Pursuant to Rule 26(c):

IT IS HEREBY ORDERED that the Motion is GRANTED.

IT IS FURTHER ORDERED that Plaintiffs shall file their responses and objections to the SSG Defendants' First Set of Interrogatories and Requests for Production of Documents on or before October 1, 2020.

IT IS FURTHER ORDERED that the parties shall meet and confer within 14 days of entry of this Order to generate mutually agreeable search terms to extract documents from Plaintiffs' Hard Drive.

IT IS FURTHER ORDERED that, in the event the parties are unable to generate mutually agreeable search terms, each party shall submit to the Court a list of proposed search terms within 21 days of entry of this Order. The Court will then enter a subsequent Order that specifies the search terms to be utilized to extract documents from Plaintiffs' Hard Drive.

IT IS FURTHER ORDERED that the search shall be conducted by a qualified third-party vendor. If the parties are unable to agree upon a qualified third-party vendor, then each party shall submit a proposed firm(s) to conduct the search within 21 days of entry of this Order. The Court will then enter a subsequent Order that identifies the third-party vendor that will conduct the search.

IT IS FURTHER ORDERED that after the search has been completed, Plaintiffs shall review the extracted documents to ensure no documents were inadvertently produced, and then Plaintiffs shall turnover an exact duplicate of the documents extracted from Plaintiffs' Hard Drive to the SSG Defendants. In the event Plaintiffs maintain a document(s) has been inadvertently produced, Plaintiffs shall inform the SSG Defendants of the nature and content of the document that was inadvertently produced. If the parties disagree as to whether the document was produced in error, either party may file a motion to have a determination made by the Court.

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IT IS FURTHER ORDERED that Plaintiffs are entitled to attorney fees and costs

pursuant to Rule 26(c)(3). Plaintiffs shall file a statement of fees and costs incurred within 21

days of entry of this Order.

William S. Stickman

United States District Judge